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UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA	
In re: HVI CAT CANYON, INC.,	Chapter 7 Case Number Case No.: 9:19-bk-11573-MB
	Professional Fee Statement Number: 4 Month of: June, 2021
	Debtor

1. Name of Professional:	Robins Kaplan LLP
2. Date of entry of order approving employment of the professional:	4/8/21
3. Total amount of pre-petition payments received by the professional:	\$0
4. Less: Total amount of pre-petition services rendered and expenses:	-\$0
5. Balance of funds remaining on date of filing of petition:	\$1 million
6. Less: Total amount of all services rendered per prior fee statements: (Line 6 is not used when filing Statement Number 1).	See attached
7. Less: Total amount of services and expenses this reporting period:	See attached
8. Balance of funds remaining for next reporting period:	See attached

DETAILED DOCUMENTATION SUPPORTING THE PROFESSIONAL FEES EARNED AND THE EXPENSES INCURRED DURING THIS REPORTING PERIOD HAS BEEN SERVED ON THE UNITED STATES TRUSTEE. A COPY OF THE DETAILED DOCUMENTATION WILL BE PROVIDED BY THE PROFESSIONAL TO ANY PARTY UPON REQUEST. FEES AND COSTS WILL BE WITHDRAWN FROM THE TRUST ACCOUNT IN THE AMOUNT STATED IN ITEM 7 ABOVE UNLESS AN OBJECTION IS FILED WITH THE CLERK OF THE COURT AND SERVED ON THE PROFESSIONAL NAMED ABOVE WITHIN 10 DAYS FROM THE DATE OF SERVICE OF THIS STATEMENT

9. Total number of pages attached hereto:	15
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The above is a true and correct statement of fees earned and expenses incurred during the indicated reporting period.

Dated: July 20, 2021

Robins Kaplan, LLP
Type Name of Professional


Signature of Professional

James P. Menton, Jr.

Type Name of Attorney for Professional (if applicable)

Signature of Attorney for Professional (if applicable)

ATTACHMENT TO PROFESSIONAL FEE STATEMENT NO. 4
Robins Kaplan LLP (“Robins” or “applicant”)

1. Michael A. McConnell was appointed as Chapter 11 Trustee for HVI Cat Canyon, Inc. (the “debtor”) on or about October 21, 2019.

2. Pursuant to an order entered on or about December 17, 2020, the Court converted the debtor’s case to Chapter 7. On or about January 5, 2021, the Trustee accepted appointment as the interim Chapter 7 Trustee for the debtor’s estate and continues to serve in that capacity for the benefit of creditors.

3. On or about October 13, 2020, the Court entered its *Order Authorizing (A) the Trustee’s Sale to Team Maria Joaquin, L.L.C. and Maria Joaquin Basin, L.L.C. (“Team Maria”) of Substantially All of the Estate’s Assets Free and Clear of All Liens, Claims, Encumbrances and Interests, (B) The Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, Related Cure Amounts, and (C) Granting Related Relief* (docket no. 1393) (“Team Maria Sale Order”). Pursuant to agreements entered into during the Chapter 11 portion of the case, UBS and Team Maria agreed to put up a total of \$1 million to secure investigation and prosecution of litigation claims, and to cover fees and costs of Chapter 7 professionals (the “Litigation Fund”). Robins and other professionals may look to the Litigation Fund for fees and costs incurred during the Chapter 7 portion of the case by submission of professional fee statements.

4. On or about October 26, 2020, the Trustee filed a motion for approval of a stipulation with UBS regarding the Litigation Fund (doc no. 1411) which the Court approved pursuant to an order entered on or about December 10, 2020 (doc no. 1504).

5. On or about March 9, 2021, the Trustee filed the *Chapter 7 Trustee’s Notice Of Application And Application To Employ Robins Kaplan, LLP As Special Litigation Counsel* (the “Application” docket no. 1573), which was approved by the Court’s order entered on or about April 8, 2021 (docket no. 1596), effective February 9, 2021. The order on the Application authorized Robins to draw down on the Litigation Fund via monthly professional fee statements for 80% of fees and 100% of costs. Robins applied to amend its retention to address expanded scope of work and lifting the cap of \$125,000 in the approved Application. The order thereon was entered on July 14, 2021.

6. **Professional Statement No. 4:** This is Robins’ fourth Professional Fee Statement during the Chapter 7 portion of the case.

a. During the period February 9, 2021, through March 31, 2021, Robins incurred fees and costs of \$62,578.50, and \$17.20, respectively, for a total of \$62,595.70. Pursuant to the professional fee statement filed on April 16, 2021 (doc no. 1606), Robins requested payment of \$50,080.00. Payment has been received of \$50,080.20.

b. During the period April 1, 2021, through April 30, 2021, Robins incurred fees and costs of \$102,280.00, and \$1,470.74, respectively, for a total of \$103,750.74. Pursuant to the professional fee statement filed on May 27, 2021 (doc no. 1657), Robins

requested payment of \$50,217.58 as explained therein. Payment has not been received to date.

c. During the period May 1, 2021, through May 30, 2021, Robins incurred fees and costs of \$207,309.00, and \$1,180.65, respectively, for a total of \$208,489.65. Pursuant to the professional fee statement filed on June 23, 2021 (doc no. 1621), Robins requested payment of \$167,027.85 as explained therein. Payment has not been received to date.

7. Request for Payment of Professional Fees: During the period June 1, 2021, through June 30, 2021 (the “Subject Period”), Robins incurred fees and costs of \$98,040.50, and \$9,297.40, respectively, for a total of \$107,337.90. Robins is requesting that it be paid for the Subject Period 80% of fees, or \$78,432.40, and 100% of costs of \$9,297.40, for a total of \$87,729.80. In addition, given entry of the referenced order on July 14, 2021, Robins is requesting that it be paid an additional \$33,077.16 based upon Robins’ Second Professional Fee Statement, which combined with its earlier requested payment thereunder will result in Robins being paid 80% of fees, or \$81,824, and 100% of costs of \$1,470.40, respectively, for a total of \$83,294.74, for the period April 1, 2021, through April 30, 2021, pursuant to Robins’ Second Professional Fee Statement.

8. Status of Litigation Fund: As of July 19, 2021, the Litigation Fund contained \$777,822.00 to cover ongoing Chapter 7 administrative expenses. However, UBS has not yet funded its \$500,000. It is anticipated that a motion to approve that borrowing will be filed shortly.

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 1901 Avenue of the Stars, Suite 450, Los Angeles, CA 90067-6006.

A true and correct copy of the foregoing document entitled (*specify*): **PROFESSIONAL FEE STATEMENT NO. FOUR (ROBINS KAPLAN)** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On July 20, 2021, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Service information continued on attached page.

2. SERVED BY UNITED STATES MAIL: On July 20, 2021, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

HVI Cat Canyon, Inc.
c/o Capitol Corporate Services, Inc.
36 S. 18th Avenue Suite D
Brighton, CO 80601-2452

Debtor
HVI Cat CANYON, INC.
630 Fifth Avenue, Suite 2410
New York, NY 10111

Service information continued on attached page.

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on July 20, 2021, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Eric Vanhorn – ericvanhorn@spencerfane.com
Robert Wallan *robert.wallan@pillsburylaw.com*,
Jonathan Doolittle *jonathan.doolittle@pillsburylaw.com*;
William J. Hotze *william.hotze@pillsburylaw.com*
Anthony A. Austin *Anthony.Austin@doj.ca.gov*

Service information continued on attached page.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

July 20, 2021

Date

Vivian Servin

Printed Name

/s/ Vivian Servin

Signature

ADDITIONAL SERVICE INFORMATION (if needed):

1. SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (“NEF”)

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2. **SERVED BY U.S. MAIL**

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